

FILED

MAY 18 2016

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBIN D. MATTHEWS,

Defendant.

4:16CR208 HEA/DDN

INDICTMENT

COUNT 1

(Mail Fraud)

The Grand Jury charges that:

**A. Introduction**

1. At some time prior to May 1, 2015, defendant obtained employment with United HealthCare which allowed her access to the identifying information of insureds of the company.
2. Between May 5, 2015 and February 3, 2016, defendant accessed the records of at least 75 insureds of the company for purposes unrelated to her duties.
3. Between October 8, 2015 and December 31, 2015, defendant submitted 145 fraudulent credit applications to Chase Bank using her residence in St. Louis, Missouri as the mailing address.

4. Between October 8, 2015 and January 5, 2016, defendant submitted 31 fraudulent credit applications to Capital One Bank using her residence in St. Louis, Missouri as the mailing address.

5. Between October 9, 2015 and January 15, 2016, defendant submitted 40 fraudulent credit applications to Citibank using her residence in St. Louis, Missouri as the mailing address.

6. Between October 28, 2015 and December 30, 2015, defendant submitted 13 fraudulent applications to American Express listing herself as the authorized user.

7. Between October 28, 2015 and December 30, 2015, defendant used her residence as the mailing address for 6 of the fraudulent American Express applications and the addresses of E.B. and D.M. for the remaining 7 applications.

8. On December 4, 2015, defendant submitted a temporary change of address form with the United States Postal Service for E.B. which changed her mailing address from E.B.'s residence in Illinois to defendant's residence in St. Louis, Missouri.

9. On December 8, 2015, defendant submitted a temporary change of address form with the United States Postal Service for D.M. which changed her mailing address from D.M.'s residence in Florida to defendant's residence in St. Louis, Missouri.

10. At some date prior to February 3, 2016, E.C., a resident of the Eastern District of Missouri and a United HealthCare insured, discovered that her identity had been fraudulently used to apply for credit accounts at various financial institutions including Synchrony Bank.

11. On February 3, 2016, the United States Postal Service delivered to defendant's St. Louis residence an envelope addressed to E.C. from Synchrony Bank.

**B. The Scheme to Defraud**

11. Beginning on or about October 1, 2015 and continuing through on or about February 3, 2016, in the Eastern District of Missouri and elsewhere, the defendant,

**ROBIN D. MATTHEWS,**

devised, and intended to devise, a scheme and artifice to defraud financial institutions, by means of materially false and fraudulent pretenses, representations and promises that various individuals were applying for credit from the financial institutions, well knowing that such pretenses, representations and promises would be and were false and fraudulent when made.

12. It was part of the scheme and artifice to defraud that:

- a. Defendant utilized her employment at United HealthCare in order to obtain the identifying information of individuals who were, or had been, insured by the company.
- b. Upon obtaining the information, defendant used it to apply for credit accounts from various financial institutions
- c. Defendant directed the financial institutions to use her residence in St. Louis, Missouri as the mailing address.
- d. Pursuant to defendant's directions, financial institutions mailed credit cards that had been approved through the use of the identifying information of United HealthCare insureds.
- e. Defendant obtained the credit cards, and used them for her benefit.

C. The Mailing

13. On or about November 13, 2015, in the Eastern District of Missouri, the defendant,

**ROBIN D. MATTHEWS,**

for the purpose of executing the above-described scheme to defraud, did knowingly cause to be deposited a letter, containing a credit card ending in 9226 issued by Capital One to E.M.M., which was sent and delivered by the United States Postal Service and a private and commercial interstate carrier from Chesapeake, Virginia to 11055 Worchester Drive, St. Louis, Missouri 63136.

In violation of Title 18, United States Code, Section 1341.

**COUNT 2**

(Fraudulent Use of Access Devices)

The Grand Jury further charges that:

A. The allegations set forth in paragraph A of Count 1 are restated and incorporated as if fully set forth herein.

B. Between on or about October 1, 2015 and January 15, 2016, in the Eastern District of Missouri, the defendant,

**ROBIN D. MATTHEWS,**

in a matter affecting interstate commerce, did knowingly and with intent to defraud use, and attempt to use, unauthorized access devices, that is: account numbers that had been fraudulently issued in the identities of living and deceased insureds of a health insurance company, to obtain

merchandise and services with an aggregate value exceeding \$1,000.00, that being more than \$25,000.00.

In violation of Title 18, United States Code, Sections 1029(a)(2) and (b)(1).

**COUNTS 3 THROUGH 5**

(Aggravated Identity Theft)

The Grand Jury further charges that:

A. The allegations set forth in paragraph A of Count 1 are restated and incorporated as if fully set forth herein.

B. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

**ROBIN D. MATTHEWS,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, name, date of birth, and social security number of the persons listed below, during and in relation to the commission of the felony offenses of: mail fraud, Title 18, United States Code, Section 1341; using assumed and fictitious names and addresses, Title 18, United States Code, Section 1342; use of unauthorized access devices, Title 18, United States Code, Section 1029(a)(2); and, social security fraud, Title 42, United States Code, Section 408(a)(7)(B).

<b><u>COUNT</u></b>	<b><u>DATE</u></b>	<b><u>IDENTITY</u></b>	<b><u>CREDIT ISSUER</u></b>
3	November 12, 2015	C.H.	Capital One
4	November 13, 2015	M.E.	Capital One
5	December 7, 2015	D.R.M.	American Express

In violation of Title 18, United States Code, Section 1028A.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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